

EXHIBIT 22

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 - - -

5
6 IN RE: NATIONAL : HON. DAN A.
7 PRESCRIPTION OPIATE : POLSTER
8 LITIGATION :
9 :
10 APPLIES TO ALL CASES : NO.
11 : 1:17-MD-2804
12 :

13 - HIGHLY CONFIDENTIAL -

14 SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

15 - - -

16 May 10, 2019

17 - - -

18 Videotaped deposition of
19 PATRICK KELLY, taken pursuant to notice,
20 was held at the offices of Baron & Budd,
21 600 New Hampshire Avenue, NW, Washington,
22 D.C., beginning at 8:58 a.m., on the
23 above date, before Michelle L. Gray, a
24 Registered Professional Reporter,
 Certified Shorthand Reporter, Certified
 Realtime Reporter, and Notary Public.

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 GOLKOW LITIGATION SERVICES
 877.370.3377 ph | 917.591.5672 fax
 deps@golkow.com

1 BY MR. PIFKO:

2 Q. All right. So you
3 understand that you're here to answer
4 questions and your counsel may object
5 from time to time. But unless he
6 instructs you not to answer, you're still
7 going to answer the question.
8 Understood?

9 A. Understood.

10 Q. Okay. So you understand
11 that you're here in your individual
12 capacity but you're also here as the
13 official representative of HDA with
14 respect to certain topics, correct?

15 A. I understand that, yes.

16 Q. Okay. And so that means
17 when you answer within those topics,
18 you're answering as if you are the HDA.
19 Do you understand that?

20 A. I understand that.

21 Q. Okay. I'm going to hand you
22 a copy of the notice.

23 (Document marked for
24 identification as Exhibit

1 A. I believe so, yes.

2 Q. And can you describe what it
3 means to be an affiliate member?

4 A. So affiliate members at HDA
5 are manufacturers who our member
6 companies are trading partners with.
7 They are not afforded the same membership
8 status as the core members who are the
9 distributor members. They are not
10 allowed to participate in committees.
11 They can't be on the board. They are
12 welcome to participate in HDA meetings
13 and external events if they register for
14 those. But as far as communication
15 internal, particularly in government
16 affairs, we deal strictly with the HDA
17 core members.

18 Q. Plaintiff's counsel today
19 often used the term "HDA members." And I
20 just want to clarify how you understand
21 that term.

22 Unless counsel specifically
23 referred to manufacturers, did you
24 understand the term "members" to mean